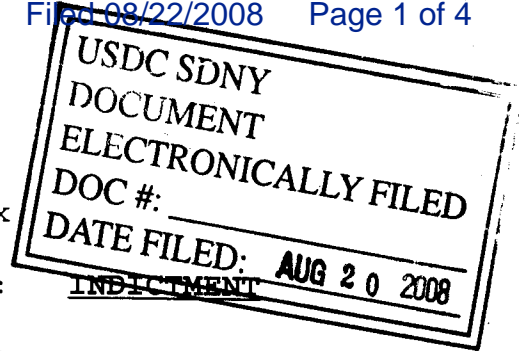


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

-v.-

CHAFIC ELARIDI,

Defendant.

08CRIM 799

COUNT ONE

The Grand Jury charges:

1. From in or about June 2006, through in or about August 2008, in the Southern District of New York and elsewhere, CHAFIC ELARIDI, the defendant, unlawfully, willfully, and knowingly, and with intent to defraud, as part of an offense affecting interstate commerce, did effect and attempt to effect transactions, with one and more access devices issued to another person and persons, to receive payment and any other thing of value during any 1-year period, the aggregate value of which is equal to and greater than \$1,000, to wit, ELARIDI used other people's credit cards to obtain money in amounts totaling more than \$1,000, without authorization from the account holders.

(Title 18, United States Code, Sections 1029(a)(5), 1029(b)(1) and 2.)

COUNT TWO

The Grand Jury further charges:

2. From in or about June 2006, up to and including in or about August, 2008, in the Southern District of New York and

elsewhere, CHAFIC ELARIDI, the defendant, unlawfully, willfully, and knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Section 1028A(c), to wit, ELARIDI possessed and used the name and other personal identification information of other individuals to commit access device fraud as charged in Count One.

(Title 18, United States Code, Sections 1028A and 2.)

FORFEITURE ALLEGATION

3. As the result of committing one or more of the offenses alleged in Counts One through Three herein, CHAFIC ELARIDI, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. §982(a)(2)(B), any property constituting, or derived from, proceeds obtained directly or indirectly as a result of such violations, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offenses alleged in Counts One through Three.

Substitute Asset Provision

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the above-described forfeitable property.

(Title 18, United States Code, Sections 982, 1028 and 1029.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

CHAFIC ELARIDI,

Defendant.

INDICTMENT

08 Cr.

(18 U.S.C. §§ 1029(a)(5),
1029(b)(1), 1028A, and 2)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL

Cynthia Canasquillo
Foreperson.

8/22/08
FD-101 Part H-1-87
This case is assigned to Judge
Hollister for all purposes A/w
order.
Judge Hollister